REMARKS

Applicant respectfully requests reconsideration and allowance of claims 1-3 and 5-16 now pending in the above-identified patent application. Applicant has amended claims 1, 5-8, 10, and 13-16, canceled claim 4. No new subject matter has been added by way of the amendments herein.

Objection to the Information Disclosure Statement

The Examiner alleges that the information disclosure statement (IDS) filed on September 29, 2006 fails to comply with 37 C.F.R. §§ 1.97, 1.98. In response, Applicant has filed a supplemental IDS enclosing a copy of the "Bayer Material Science" document. As the document is in the German language, a Statement of Relevance is also included.

35 U.S.C. § 112 rejections

At page 3 of the Office Action, the Examiner rejected to claims 7, 14 and 16 under 35 U.S.C. § 112, first paragraph, alleging that the subject claims are non-enabled. Applicant has amended claims 7, 14 and 16 herein to address the enablement issue. Applicant submits that the subject claims are enabled and, accordingly, the Examiner is respectfully requested to withdraw the subject rejection.

At page 3 of the Office Action, the Examiner rejected claims 1-7, 10 and 13 under 35 U.S.C. § 112, second paragraph, as being indefinite. In response, Applicant has amended claims 1, 10 and 13 herein to address the Examiner's concerns. Accordingly, Applicant requests that the Examiner withdraw the subject rejection.

35 U.S.C. § 102 rejections

At page 5 of the Office Action, the Examiner rejected claims 1-6, 8-13 and 15 under 35 U.S.C. § 102(b) as being anticipated by US Patent No. 6,574,922 to Velthaus et al. (hereinafter "Velthaus"). At page 7 of the Office Action, the Examiner rejected claims 1-3, 6 and 8-13 under 35 U.S.C. § 102(b) as being anticipated by US Patent No. 6,253,491 to Pages (hereinafter "Pages"). In view of the amendments herein and remarks below, Applicant traverses the Examiner's rejections.

Independent claims 1, 8, and 15 require a mounting area for cable drum for either a power or manual window lift drive. In order to achieve sucha capability, the subject claims require a number of structural features, including:

> that the mounting area include integrally formed side walls and a back wall, all defining an internal volume;
>
> first and second areas having respective diameters for accomodating the power and manual window lift drives; and
>
> a thrust bearing integrally formed on the back wall of the mounting area, in axial alignment with the first and second diameters of the first and second areas, and for receiving a mounting axle of the manual window lift drive.

Neither the Velthaus nor Pages references discloses or suggests the above structural details of the claimed invention.

Velthaus discloses a conventional door construction, namely a metal inner panel 12, and a separate, plastic door trim panel 20 (or carrier). The metal inner panel 12 includes a wall 54' and aperture 55' for receiving a driving shaft 45 of a power lift drive 40. The door trim panel 20 includes a cup-shaped housing 52, including side walls but no back wall. Instead, the housing 52 includes an aperture 51 extending through the housing 52, which aperture 51 is in registration with the wall 54' of the metal inner panel 12. Pages also does not disclose or suggest the above-quoted structural features of independent claims 1, 8, and 15.

The structures disclosed in Velthaus and Pages are in contrast to the structural features of claims 1, 8, and 15 quoted above. These structural features may be more clearly appreciated when viewing one embodiment of the claimed subject matter shown in FIGS. 1 and 2 of the instant application. The door module 100 (or carrier) includes an integrally formed drum

housing 104 having integrally formed side walls and a back wall defining an inner volume. The inner volume includes first and second areas, each having a particular diameter 107, 112 suitable for receiving either a cable drum 108 for a power window lift drive or cable drum 118 for a manual window lift drive. A thrust bearing 120 (or slide bearing) is integrally formed on the back wall of the drum housing 104 and is sized, shaped, and in axial alignment with the first and second areas so that it receives a mounting axle 122 of the manual window lift drive.

In view of the above, neither Velthaus nor Pages anticipates the features of the subject matter recited in independent claims 1, 8, and 15. As each of the subject dependent claims incorporates all the limitations of its respective base claim, and as each recites additional patentable subject matter, the Examiner is respectfully requested to withdraw the rejections of all the subject claims.

35 U.S.C. § 103 rejections

At page 7 of the Office Action, the Examiner rejected claims 7, 14 and 16 under 35 U.S.C. § 103(a) as being obvious over Pages. Applicant traverses this rejection. The deficiencies of Pages as concerns claims 1, 8 and 15 of the instant application were discussed above. Such deficiencies are not overcome under an obviousness analysis. Indeed as Pages fails to disclose any structure showing that the mounting area includes integrally formed side walls and a back wall, and a thrust bearing integrally formed on the back wall of the mounting area, maintaining the subject rejection would require imbuing the reference with subject matter that does not exist. According, Applicant respectfully requests that the obviousness rejections of the subject claims be withdrawn.

Conclusion

In view of the foregoing, Applicant submits that the instant claims are in condition for allowance. Early and favorable action is earnestly solicited. In the event there are any fees due

and owing (or refundable) in connection with this matter, please charge same to our Deposit Account No. 11-0223.

Dated: October 9, 2009

Respectfully submitted,

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